

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

IN RE:)	Case No. 02-CV-72-SPF-FHM
)	
WILLIAMS SECURITIES LITIGATION)	Lead Case
)	
This Document Relates to the WCG Subclass)	Judge Stephen Friot
)	
)	

**MOTION *IN LIMINE* NO. 1 OF THE WILLIAMS COMPANIES, INC., AND
KEITH E. BAILEY TO EXCLUDE IMPROPER EXPERT TESTIMONY**

Defendants The Williams Companies, Inc., and Keith E. Bailey (collectively "Defendants") hereby move this Court for an Order in *limine* directed to Plaintiffs, their attorneys, and their witnesses (collectively "Plaintiffs"), precluding Plaintiffs from: (a) using expert witnesses to provide narration or commentary on exhibits and the testimony of fact and expert witnesses; (b) introducing otherwise inadmissible factual evidence through their experts; (c) allowing their experts to opine on ultimate issues of fact without taking into account all material factual information; and (d) seeking to have their experts testify as to ultimate legal issues, including the "falsity" and "materiality" of a statement or the "intent" of any Defendant.

This Motion is brought on the grounds that the potential testimony listed above (items (a) through (d)) would usurp the fact-finding role of the jury, is beyond the province of experts under Federal Rules of Evidence 702, 703, and 704, and is unduly prejudicial under Federal Rule of Evidence 403.

Dated: November 7, 2006

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of November, 2006, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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and to the remaining parties on the Master Service List in this matter, as specified thereon.

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